



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 14, 2023

BY EMAIL & ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: United States v. Juan Orlando Hernandez, S7 15 Cr. 379 (PKC)
 United States v. Juan Carlos Bonilla Valladares, S8 15 Cr. 379 (PKC)**

Dear Judge Castel:

The Government respectfully writes to request that the Court adjourn the deadline for its motion pursuant to Section 4 of the Classified Information Procedures Act (“CIPA”) for approximately 60 days, from March 17, 2023 to May 17, 2023. The reasons for this request are set forth in a classified letter being submitted, for the reasons stated therein, *ex parte* and under seal. Defense counsel for Juan Orlando Hernandez have advised that they object to this motion for an adjournment of the Government’s CIPA Section 4 deadline. Defense counsel for Juan Carlos Bonilla Valladares have advised that they consent to this motion.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/
Jacob H. Gutwillig
David J. Robles
Elinor L. Tarlow
Kyle A. Wirshba
Assistant United States Attorneys
(212) 637-2215 / 2550 / 1036 / 2493

cc: Defense Counsel (by ECF)